

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PROJECT VERITAS and PROJECT  
VERITAS ACTION FUND,

Plaintiffs,

-against-

JAMES O'KEEFE, TRANSPARENCY 1,  
LLC d/b/a O'KEEFE MEDIA GROUP, RC  
MAXWELL, and ANTHONY  
IATROPOULOS,

Defendants.

Civil Action No. 7:23-cv-04533

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**JOINT MOTION FOR ORDER  
REFERRED CASE TO MEDIATION**

NOW COME Plaintiffs Project Veritas and Project Veritas Action Fund ("Plaintiffs") and Defendants James O'Keefe and Transparency 1, LLC d/b/a O'Keefe Media Group ("O'Keefe Defendants"), RC Maxwell, and Anthony Iatropoulos (collectively "the Parties"), and hereby request that this Court enter an Order pursuant to Local Civil Rule 83.9 and the Court's Mediation Program Procedures referring this matter for a Settlement Conference before a Magistrate Judge of this Court, and to stay proceedings pending the outcome of the Settlement Conference.

During the pendency of this case, the Parties, particularly Plaintiffs and the O'Keefe Defendants, had been negotiating toward reaching a settlement. Instead of making potentially unnecessary expenditures through the exchanging of written discovery, the taking of depositions, and dispositive motion practice, the Parties believe that a Magistrate Judge of this Court would be effective in a Settlement Conference. And, in furtherance thereof, proceedings in this matter should be stayed during the pendency of ADR proceedings in order to ensure those costs are avoided.

WHEREFORE the Parties respectfully request this Honorable Court stay proceedings and refer the matter to a Magistrate Judge to conduct a Settlement Conference.

Dated: January 9, 2024.

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)  
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*Counsel for Plaintiffs,  
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Respectfully Submitted,

/s/ Seldon J Childers

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*Counsel for Defendants,  
James O'Keefe and O'Keefe Media Group.  
RC Maxwell, and Anthony Iatrououlos*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

*/s/ Jay M. Wolman*  
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Jay M. Wolman (JW0600)